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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**STATE OF NEVADA**

DAVID PAUL CASAB, an individual,

CASE NO.: 2:22-cv-01121-JCM-EJY

Plaintiff,

V.

WALMART, INC., d/b/a WALMART #5269; WAL-MART STORES, INC.; WAL-MART NEIGHBORHOOD MARKET; ALISHA MEDRANO; DOE PROPERTY OWNER I-V; ROE PROPERTY OWNER I-V; DOE JANITORIAL EMPLOYEE I-V; ROE JANITORIAL COMPANY I-V; ROE MAINTENANCE COMPANY I-V; ROE PROPERTY MANAGEMENT COMPANY IV; DOE MAINTENANCE WORKER I-V; DOE PROPERTY MANAGER I-V; DOE EMPLOYEE I-V; ROE EMPLOYER I-V; and ROE COMPANIES I-V, inclusive, jointly and severally,

**STIPULATION AND ORDER TO**  
**EXTEND DATE OF PLAINTIFF'S**  
**RESPONSE TO DEFENDANT'S**  
**MOTION FOR SUMMARY**  
**JUDGEMENT**

**[SECOND REQUEST]**

## Defendants.

The parties, by and through their counsel, and through their respective counsel, and stipulate to the following:

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1       1. Plaintiff will file his Opposition to Defendant's Motion for Summary Judgement  
2 by Tuesday, July 18, 2023.

3 DATED this 12<sup>th</sup> of July, 2023.

DATED this 12<sup>th</sup> of July, 2023.

4 **GINA CORENA & ASSOCIATES**

5  
6 **ALVERSON TAYLOR & SANDERS**

7       \_\_\_\_\_  
8       */s/ Mahna Pourshaban*  
9       **Mahna Pourshaban, Esq.**  
10      Nevada Bar No. 12743  
11      300 S. Fourth Street, Suite 1250  
12      Las Vegas, Nevada 89101  
13      Attorneys for Plaintiff

14       \_\_\_\_\_  
15       */s/ Kurt R. Bonds*  
16       **Kurt R. Bonds, Esq.**  
17      Nevada Bar No. 006228  
18       **Tanya Fraser, Esq.**  
19      Nevada Bar No. 013872  
20      6605 Grand Montecito Parkway  
21      Las Vegas, NV 89149  
22      Attorney for Defendants

23      G I N A   C O R E N A  
24      & A S S O C I A T E S

**CASE NO.: 2:22-cv-01121-JCM-EJY**

**STIPULATION AND ORDER TO EXTEND DATE OF PLAINTIFF'S RESPONSE TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT  
[SECOND REQUEST]**

## **IT IS SO ORDERED:**

Plaintiff will file his Opposition to Defendant's Motion for Summary Judgement by Tuesday, July 18, 2023.

DATED: July 13, 2023

**UNITED STATES DISTRICT JUDGE**

GINA CORENA

## Eva Rodriguez Dhimi

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**From:** Tanya Fraser <TFraser@AlversonTaylor.com>  
**Sent:** Thursday, July 13, 2023 1:16 PM  
**To:** Eva Rodriguez Dhimi; Debra Kay; Edith Montano  
**Cc:** America Alvarado  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Thank you, Eva. You may affix Kurt's signature.

I apologize for the delay!

**Tanya Fraser, Esq.** |  
Alverson Taylor & Sanders  
702.384.7000 | alversontaylor.com

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**From:** Eva Rodriguez Dhimi <eva@lawofficcorena.com>  
**Sent:** Wednesday, July 12, 2023 11:01 AM  
**To:** Tanya Fraser <TFraser@AlversonTaylor.com>; Debra Kay <dKay@AlversonTaylor.com>; Edith Montano <edith@lawofficcorena.com>  
**Cc:** America Alvarado <AAAlvarado@lawofficcorena.com>  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Sorry about that, here it is.

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**From:** Tanya Fraser <[TFraser@AlversonTaylor.com](mailto:TFraser@AlversonTaylor.com)>  
**Sent:** Wednesday, July 12, 2023 10:59 AM  
**To:** Eva Rodriguez Dhimi <[eva@lawofficcorena.com](mailto:eva@lawofficcorena.com)>; Debra Kay <[dKay@AlversonTaylor.com](mailto:dKay@AlversonTaylor.com)>; Edith Montano <[edith@lawofficcorena.com](mailto:edith@lawofficcorena.com)>  
**Cc:** America Alvarado <[AAAlvarado@lawofficcorena.com](mailto:AAAlvarado@lawofficcorena.com)>  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Hi Eva,

I'm sorry I didn't catch this when I agreed to the change—I've been crazy busy, as well! We have no objection to fixing the date back to July 18, but the revised SAO was not attached; please forward when you get a chance.

**Tanya Fraser, Esq.** |  
Alverson Taylor & Sanders  
702.384.7000 | alversontaylor.com

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**From:** Eva Rodriguez Dhimi <[eva@lawofficcorena.com](mailto:eva@lawofficcorena.com)>  
**Sent:** Wednesday, July 12, 2023 10:46 AM  
**To:** Tanya Fraser <[TFraser@AlversonTaylor.com](mailto:TFraser@AlversonTaylor.com)>; Debra Kay <[dKay@AlversonTaylor.com](mailto:dKay@AlversonTaylor.com)>; Edith Montano <[edith@lawofficcorena.com](mailto:edith@lawofficcorena.com)>  
**Cc:** America Alvarado <[AAAlvarado@lawofficcorena.com](mailto:AAAlvarado@lawofficcorena.com)>  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Counsel, my apologies for the inconvenience, but I drafted the SAO with a deadline of July 13, and my legal assistant brought to my attention that the original docket mentioned a due date of July 18 (see below).

Docket Text:

**MOTION for Summary Judgment by Defendants Wal-Mart Neighborhood Market, Walmart Stores Inc., Walmart, Inc.. Responses due by 7/18/2023. (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E)(Bonds, Kurt)**

Would you be okay to file the SAO allowing us to respond on July 18 as initially indicated by the Court. I am sorry for the back and forth as I am getting caught up after being out of the office for two weeks I did not catch this clerical error.

I have attached the revised SAO.

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**From:** Eva Rodriguez Dhimi  
**Sent:** Monday, July 10, 2023 4:25 PM  
**To:** 'Tanya Fraser' <[TFraser@AlversonTaylor.com](mailto:TFraser@AlversonTaylor.com)>; Debra Kay <[dKay@AlversonTaylor.com](mailto:dKay@AlversonTaylor.com)>; Edith Montano <[edith@lawofficcorena.com](mailto:edith@lawofficcorena.com)>; Mahna Pourshaban <[Mahna@lawofficcorena.com](mailto:Mahna@lawofficcorena.com)>  
**Cc:** America Alvarado <[AAlvarado@lawofficcorena.com](mailto:AAlvarado@lawofficcorena.com)>  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Perfect, I have updated to Kurt R. Bonds, Esq. and submitted for filing.

Thank you!

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**From:** Tanya Fraser <[TFraser@AlversonTaylor.com](mailto:TFraser@AlversonTaylor.com)>  
**Sent:** Monday, July 10, 2023 4:16 PM  
**To:** Eva Rodriguez Dhimi <[eva@lawofficcorena.com](mailto:eva@lawofficcorena.com)>; Debra Kay <[dKay@AlversonTaylor.com](mailto:dKay@AlversonTaylor.com)>; Edith Montano <[edith@lawofficcorena.com](mailto:edith@lawofficcorena.com)>; Mahna Pourshaban <[Mahna@lawofficcorena.com](mailto:Mahna@lawofficcorena.com)>  
**Cc:** America Alvarado <[AAlvarado@lawofficcorena.com](mailto:AAlvarado@lawofficcorena.com)>  
**Subject:** RE: Casab v. Walmart; OPP to MSJ (SAO)

Hi Eva,

For this case, you will need to put Kurt R. Bonds in the signature block or this will be rejected by the Court since he is the only counsel of record for Defendant. Once you have made that change, you may affix Kurt's electronic signature.

Thank you,

**Tanya Fraser, Esq.** |  
Alverson Taylor & Sanders  
702.384.7000 | [alversontaylor.com](http://alversontaylor.com)

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**From:** Eva Rodriguez Dhimi <[eva@lawofficcorena.com](mailto:eva@lawofficcorena.com)>  
**Sent:** Monday, July 10, 2023 4:03 PM  
**To:** Tanya Fraser <[TFraser@AlversonTaylor.com](mailto:TFraser@AlversonTaylor.com)>; Debra Kay <[dKay@AlversonTaylor.com](mailto:dKay@AlversonTaylor.com)>; Edith Montano <[edith@lawofficcorena.com](mailto:edith@lawofficcorena.com)>; Mahna Pourshaban <[Mahna@lawofficcorena.com](mailto:Mahna@lawofficcorena.com)>  
**Cc:** America Alvarado <[AAlvarado@lawofficcorena.com](mailto:AAlvarado@lawofficcorena.com)>  
**Subject:** Re: Casab v. Walmart; OPP to MSJ (SAO)  
**Importance:** High

Good afternoon Counsel,